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13 UNITED STATES DISTRICT COURT

14 DISTRICT OF ARIZONA

15 In Re Bard IVC Filters Products  
16 Liability Litigation

17 No. MD-15-02641-PHX-DGC

18 **PLAINTIFF TINLIN'S MOTION TO  
19 SEAL REGARDING EXHIBITS TO  
20 PLAINTIFF'S MOTION IN LIMINE**

21 In accordance with Section 25 of the Stipulated Protective Order [Doc. 269],  
22 Federal Rule of Civil Procedure 26(c)(1)(G), and Local Civil Rule 5.6, Plaintiff moves  
23 this Court for an Order sealing the exhibits to Plaintiff Tinlin's Motion *In Limine* No. 6  
24 and the corresponding Order, attached. The exhibits to Plaintiff's Motion *in Limine* No. 6  
25 contain personal healthcare information regarding the Plaintiff that is protected under  
26 HIPAA and confidential under the Stipulated Protective Order, warranting protection  
27 from public disclosure.

28 Plaintiff's personal healthcare information is protected under the Privacy Rule of  
29 the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"), 45 C.F.R. §  
30 160, 164(A) & (E), as well as several state-law privileges. The knowing disclosure of such  
31 information is prohibited by 42 U.S.C. § 1320d-6. This Court has already granted the

1 filing under seal of the same (or similar) information when the parties submitted their  
2 respective bellwether submissions. [See Doc. 4366].  
3

4 Accordingly, Plaintiff requests the Court order the exhibits to Plaintiff Tinlin's  
5 Motion *In Limine* No. 6 be sealed pending final determination of confidentiality.  
6

7 RESPECTFULLY SUBMITTED this 29th day of March, 2019.  
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21 *Co-Lead/Liaison Counsel for Plaintiffs*  
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## **CERTIFICATE OF SERVICE**

I hereby certify that on this 29th day of March, 2019, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/Jessica Gallentine